

EXHIBIT “3”



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Attn: Tom Liddy Maricopa
 County
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Emily Craiger
 Statement Date:
 Statement No. Account
 No.

June 3, 2022
 4378
 10222.000

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RE: Lake et. al v. Hobbs, et al.

Fees

Date	Event	Description	Rate	Hours	Fees
05/12/2022	EC	Phone conferences with J. La Rue and T. Liddy re Complaint and strategy; begin review of Complaint.	400.00	0.50	200.00
05/13/2022	EC	Review and respond to e-mail correspondence from J. LaRue re strategy.	400.00	0.20	80.00
	EC	Review e-mail correspondence from J. LaRue and L. Medaris re exec session schedule.	400.00	0.20	80.00
	EC	Review Kavanaugh election opinion and e-mail J. LaRue re same.	400.00	0.40	160.00
	EC	Review e-mail correspondence from J. LaRue re application of Purcell principle in an MTD; draft e-mail response re same.	400.00	0.50	200.00
05/14/2022	EC	Review e-mail from J. Branco re 12(b)(6) standard and response to same.	400.00	0.20	80.00
	EC	Continue review of Complaint; review and analysis of Curling v. Raffensberger Order on MTD and review docket re same; draft e-mail to J. LaRue re same.	400.00	1.20	480.00
05/16/2022	EC	Continue review of Complaint; Review status of Iqbal/Twombly standard for MTD; phone conference with J. LaRue and T. Liddy re same.	400.00	2.30	920.00
	EC	Travel to/from and attend Exec Session re Lakes v. Hobbs; meeting with J. LaRue, T. Liddy and J. Branco re Rule 11 and MTD letter and other related strategy.	400.00	3.20	1,280.00
	EC	Review Judge Tuchi's page re special requirements related to MTD/Rule 11; review local rules re same.	400.00	0.30	120.00
05/17/2022	EC	E-mail with T. Liddy and J. LaRue re 12(b)(6) requirements re notice to opposing counsel and strategy re same.	400.00	0.20	80.00
	EC	E-mail J. LaRue and J. Branco re PRR for voting records.	400.00	0.10	40.00
	EC	Review e-mail from J. La Rue re Tuchi order on MTD, review order re same; e-mails with J. La Rue, T. Liddy and J. Branco re same.	400.00	0.30	120.00
	EC	Phone conference with J. Branco re SOL argument.	400.00	0.50	200.00
	EC	Review Complaint re Arizona specific allegations.	400.00	1.20	480.00
	EC	Telephone conference with J. LaRue re strategy.	400.00	0.50	200.00

05/18/2022	EC	Review Mahoney decision re Texas election equipment; review and respond to e-mail correspondence from J. LaRue, J. Branco and T. Liddy re Rule 11/MTD letter; research case law re reliance on public record in MTD; phone conference with J. Branco re Monell argument and use of public record re MTD; telephone conference with J. LaRue re MTD, factual record and draft letter re Rule 11/MTD; draft Rule 11/MTD letter; e-mail correspondence with Pima and Maricopa County re public records request.	400.00	6.30	2,520.00
05/19/2022	EC	Review revisions to Rule 11 letter; phone conference with J. La Rue re same; Phone conference with Pima County and SOS re strategy per JDA.	400.00	1.80	720.00
	EC	Review and analysis of J. La Rue revisions to MTD/Rule 11 letter.	400.00	0.40	160.00
05/20/2022	EC	Telephone conferences with J. LaRue and T. Liddy re revisions to Rule 11/MTD letter; review Finchem and Lake voting history; revise and finalize Rule 11/MTD letter and e-mail correspondence with J. La Rue, T. Liddy and K. Hartman-Tellez re same.			
			400.00	5.30	2,120.00
05/26/2022	EC	Telephone conference with J. La Rue re dominion equipment.	400.00	0.20	80.00
	EC	GoTo meeting with Defendants counsel re status of MTDs and next steps.	400.00	0.50	200.00
	EC	Review sections of complaint for references in Iqbal/Twombly section of MTD.	400.00	0.80	320.00
	EC	E-mails with J. LaRue and K. Hartman-Tellez re <i>Notice of Appearance</i> .			
			400.00	0.20	80.00
05/27/2022	EC	Revise Iqbal section of MTD; e-mails with J. LaRue re draft MTD; GoTo conference with J. LaRue, T. Liddy and K. Hartman-Tellez re draft MTD.	400.00	5.80	2,320.00
	EC	E-mail with opposing counsel re meet and confer.	400.00	0.20	80.00
05/28/2022	EC	Revise Iqbal section of MTD; review draft MTD and related e-mails.	400.00	1.80	720.00
05/29/2022	EC	E-mail with J. LaRue re MTD taking judicial notice of certain facts and preparing certification re meet and confer.	400.00	0.10	40.00
05/30/2022	EC	Review motion to file oversized brief and e-mail J. LaRue re same.	400.00	0.30	120.00
	EC	Review MTD and prepare for meet and confer.	400.00	0.40	160.00
05/31/2022	EC	Draft certification re meet and confer; phone conferences with J. La Rue, T. Liddy, J. Branco re meet and confer; participate in meet and confer conference with counsel for all parties; draft finalize and file stipulation for extension of time re responsive pleading and proposed order re same and e-mail with counsel for all parties re same; review e-mail correspondence from SOS counsel and Plaintiff's counsel re meet and confer; phone conferences with J. La Rue, T. Liddy and J. Branco re revisions to Motion to Dismiss.	400.00	5.80	2,320.00
	EC	Review and approve Notice of Appearance.	400.00	0.10	40.00
06/01/2022	EC	Finalize and file Notice of Appearance.	400.00	0.20	80.00
06/03/2022	EC	E-mails re scheduling second meet and confer.	400.00	0.20	80.00
06/06/2022	EC	Prepare for and attend meet and confer re MTD; phone conference with T. Liddy and J. LaRue re same; phone conference with T. Liddy re same; review and edit draft MTD.	400.00	2.10	840.00

06/07/2022	EC	Revise and finalize MTD; review exhibits; file MTD; phone conferences with J. LaRue and T. Liddy re same.	400.00	2.80	1120.00
06/13/2022	EC	Meeting with J. La Rue and K. Hartman-Tellez re strategy responding to motion for PI; review e-mail from A. Kolodin re amicus.	400.00	0.60	240.00
06/14/2022	EC	Continue review of declarations and exhibit to Motion for PI; review case law cited; schedule call per JDA.	400.00	2.30	920.00
06/15/2022	EC	Continue review of PI Motion and exhibits; phone conference with J. La Rue and T. Liddy re strategy; research re PI standard, 2020 election cases review, and available remedies; e-mail J. La Rue re whether MTD needs to be refiled; review amicus brief and e-mails re same; review A. Dershowitz pro hac admission; phone conference with J. La Rue and T. Liddy re opposition to page limit extension and review draft of same; review order granting page limit extension; strategy call per JDA re response to PI; research re Rule 11.	400.00	5.60	2240.00
06/16/2022	EC	Begin drafting response to Motion for PI; continue reviewing Motion for PI exhibits re response.	400.00	1.70	680.00
06/17/2022	EC	Continue draft of Response to MPI; e-mail correspondence with J. LaRue and T. Liddy re same; phone conferences with J. La Rue and T. Liddy re same; e-mail correspondence re responding to Amicus brief; review EPM decision.	400.00	11.80	4720.00
06/18/2022	EC	Review J. La Rue revision re response to MPI and revise same; e-mail correspondence re same.	400.00	1.90	760.00
06/19/2022	EC	Review e-mail from S. Jarett re draft declaration.	400.00	0.40	160.00
06/20/2022	EC	Review revisions to response to MPI; phone conferences with J. La Rue and T. Liddy re same; review draft motion for leave re amicus brief and draft e-mail re same.		2.30	920.00
06/21/2022	EC	Revise S. Jarett declaration.	400.00	0.90	360.00
	EC	Revise Response to MPI, including adding S. Jarrett declaration citations.	400.00	1.30	520.00
	EC	Initial review of response to County MTD and Motion for judicial notice.	400.00	0.30	120.00
06/22/2022	EC	Finalize and file response to MPI; e-mails with J. LaRue and K. Hartman-Tellez re drafting strategy on reply ISO MTD; review plaintiffs response to SOS MTD; review SOS opposition to MPI.	400.00	1.20	480.00
06/27/2022	EC	Review and analysis of Response to MTD; review case law cited in Response; draft Reply ISO of MTD.	400.00	7.20	2880.00
06/28/2022	EC	Finalize and file Reply ISO MTD; e-mail with J. LaRue, K. Hartman Tellez and J. Branco re same; phone conferences with J. LaRue re same.	400.00	3.40	1360.00
06/29/2022	EC	Review SOS reply ISO of MTD; Review Plaintiff's reply ISO of PI.	400.00	0.40	160.00
07/01/2022	EC	Review Amicus brief and draft response to same.	400.00	0.90	360.00
07/05/2022	EC	Finalize draft response to amicus brief.	400.00	0.40	160.00
07/08/2022	EC	Review Rule 11 rules and related case law.	400.00	0.90	360.00

07/11/2022	EC	Review court's scheduling order and e-mail with J. La Rue and T. Liddy regarding same.	400.00	0.40	160.00
07/12/2022	EC	Phone conferences with J. La Rue and T. Liddy regarding hearing strategy.	400.00	1.20	480.00
07/13/2022	EC	Phone conference with SOS counsel regarding hearing strategy.	400.00	0.90	360.00
	EC	Continue draft of Rule 11 Motion.	400.00	0.90	360.00
07/14/2022	EC	Continue draft of Rule 11 Motion.	400.00	10.60	4240.00
07/15/2022	EC	Continue draft of Rule 11 Motion and phone conferences with J. LaRue and T. Liddy regarding same.	400.00	2.10	840.00
07/16/2022	EC	Revise Rule 11 Motion and e-mail with J. LaRue, K. Hartman-Tellez, J. Branco and T. Liddy regarding same.	400.00	1.20	480.00
07/16/2022	EC	Review K. Hartman-Tellez revisions to Rule 11 Motion.	400.00	0.20	80.00
	EC	Review Plaintiff's transcript request	400.00	0.10	40.00
07/18/2022	EC	Cite check and finalize Rule 11 Motion ; Draft cover letter to Plaintiffs' counsel re Rule 11 Mtn; phone conferences with J. LaRue and T. Liddy re rule 11 Motion and hearing preparation.	400.00	3.20	1280.00
	EC	Research regarding Daubert standard.	400.00	3.20	1280.00
07/19/2022	EC	Review e-mail correspondence with counsel regarding witness and exhibits; phone conferences with J. LaRue and T. Liddy re hearing strategy; review pleadings and prepare for oral argument; review witness declarations.	400.00	4.20	1680.00
07/20/2022	EC	Review Daubert Motion filed by SOS and draft joinder to same; Review witness lists; Moot court oral argument and hearing; review direct examination outline for S. Jarrett; Final preparation for closing argument; review case law and "expert testimony" cited by plaintiff; review Iqbal/Twombly standard and related case law.	400.00	8.40	3360.00
07/21/2022	EC	Review SOS filing re expert flight delay; communication with J. LaRue and T. Liddy regarding same; appear at hearing regarding preliminary injunction and motion to dismiss; review court minute entries regarding same.	400.00	8.90	3560.00
07/22/2022	EC	Review draft answer to judge's question; review draft notice of errata; phone conference with J. LaRue regarding same.	400.00	0.80	320.00
07/25/2022	EC	Virtual attendance at BOS executive session re update.	400.00	1.30	520.00
	EC	Review transcript request from D. Cross and e-mail J. LaRue regarding same.	400.00	0.20	80.00
07/26/2022	EC	Review B. Cotton declaration.	400.00	0.20	80.00
	EC	Review e-mail correspondence from G. Golec and e-mail.	400.00	0.30	120.00
08/01/2022	EC	E-mail correspondence with J. LaRue regarding letter to Fann re deceased voters; review supplemental authority draft.	400.00	0.50	200.00
08/02/2022	EC	Review request to supplement record; e-mails with J. La Rue regarding same.	400.00	0.40	160.00

	EC	Review Notice of Supplemental Authority and e-mail correspondence with J. La Rue and K. Hartman-Tellez regarding same.	400.00	0.30	120.00
08/09/2022	EC	E-mail correspondence with J. LaRue and T. Liddy re filing Rule 11 motion; review motion and correspondence with opposing counsel regarding same.	400.00	0.80	320.00
08/10/2022	EC	Finalize and file Rule 11 Motion.	400.00	1.20	480.00
	EC	Draft proposed order re Rule 11 Motion; phone conference and e-mail correspondence with J. LaRue regarding same.	400.00	0.30	120.00
	EC	Phone conferences with J. LaRue and T. Liddy regarding media coverage.	400.00	0.50	200.00
08/11/2022	EC	Phone conferences with T. Liddy, Z. Schira and J. LaRue re media coverage; prepare regarding same and phone conferences with media re same.	400.00	2.10	840.00
08/12/2022	EC	Create timeline re Rule 11 motion.	400.00	0.60	240.00
08/15/2022	EC	Prepare for and attend executive session regarding update.	400.00	3.80	1520.00
08/24/2022	EC	Initial review of response to Rule 11 Motion.	400.00	0.80	320.00
	EC	Phone conference with J. LaRue regarding Reply re Rule 11 strategy.	400.00	0.50	200.00
08/25/2022	EC	Review Plaintiff's response to Daubert motion.	400.00	0.30	120.00
08/26/2022	EC	Review and analysis of order dismissing case; review research re sanctions post-dismissal; e-mails with J. LaRue, T. Liddy, J. Branco and K. Hartman-Tellez re Rule 11 strategy and dismissal; review order granting pro hac.	400.00	2.20	880.00
08/28/2022	EC	Begin draft of Reply ISO Rule 11.	400.00	1.60	640.00
08/29/2022	EC	Review FAC, Motion for PI and Response to Rule 11; continue draft of Reply ISO Rule 11.	400.00	4.80	1920.00
08/30/2022	EC	Review case law cited in Response to Rule 11 Motion; continue draft of Reply in Support of Rule 11 Motion.	400.00	8.60	3340.00
08/31/2022	EC	Phone conferences with J. LaRue and T. Liddy regarding Reply in support of Rule 11 Motion; Finalize and file same.	400.00	4.80	1920.00
09/09/2022	EC	Review e-mail from J. LaRue regarding subpoena to SOS from M. Lindell.	400.00	0.20	80.00
09/16/2022	EC	Phone conferences with J. Branco regarding appeal strategy; review e-mail correspondence regarding same; phone conference with J. Branco, J. LaRue and SOS counsel regarding same.	400.00	0.70	280.00
09/23/2022	EC	Telephone conference with J. LaRue regarding executive session update.	400.00	0.20	80.00
09/26/2022	EC	Prepare for and attend executive session regarding litigation update.	400.00	0.70	280.00
10/03/2022	EC	Review D. Logan and B. Cotton testimony re admissions related to recount; e-mails with Z. Shira regarding same.	400.00	1.30	520.00
10/04/2022	EC	E-mail with T. Liddy re PRR and letter to Cotton re EMS data.	400.00	0.20	80.00
	EC	E-mails with T. Liddy and J. LaRue re requesting names from B. Cotton; draft correspondence to B. Cotton re same.	400.00	0.30	120.00
10/05/2022	EC	Complete draft of letter to B. Cotton re EMS data; e-mails with J. LaRue and T. Liddy re same.	400.00	0.50	200.00

10/19/2022	EC	E-mail T. Liddy and J. La-Rue re Cotton non-response.	400.00	0.20	80.00
12/01/2022	EC	Review and analysis of sanction order.	400.00	1.00	400.00
TOTAL				178.30	71220.00